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September 13, 2019

Hon. Kiyo A. Matsumoto  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *United States v. Donville Inniss*, Docket No. 18-Cr.-134 (KAM)**

Dear Judge Matsumoto:

On July 15, 2019, the government provided defense counsel with expert notice pursuant to Rules 16(a)(1)(G) and 26.1 of the Federal Rules of Criminal Procedure. During the pretrial conference on September 6, 2019, defense counsel agreed to let the court know by today, September 13, 2019, whether the defense objects to the proposed testimony of Thomas Durbin, LLM, who is the government's expert witness on Barbadian law.

With the court's permission, defense counsel is requesting an opportunity to file our objections by Monday September 16, 2019. We just need some additional time to complete our legal research as it relates to laws of a foreign nation.

Finally, the government has been informed of counsel's intention to request this brief extension of time and has no objection.

Respectfully,

*Anthony L. Ricco*

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cc: A.U.S.A. Sylvia Shweder (By E.C.F.)

cc: Gerald M. Moody, Jr. (By E.C.F.)  
Trial Attorney  
U.S. Department of Justice